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12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION
15

16 JENI PEARSONS, et al.,

17 Plaintiffs,

18 v.

19 UNITED STATES OF AMERICA, et
20 al.,

21 Defendants.

No. 2:23-cv-07952-RGK-MAR

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY NOT MORE THAN 30 DAYS (L.R.
8-3)**

Complaint Served: December 22, 2023
Current Response Date: February 20, 2024
New Response Date: March 21, 2024

Honorable R. Gary Klausner
United States District Judge

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23
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25 Counsel for plaintiffs Jeni Pearsons and Michael Storck ("Plaintiffs") and
26 defendants Kathryn Bailey Dress, Brent James, Walter Dix, Ryan Heaton, and Lesley
27 Buchan (hereinafter collectively referred to as the "Additional Individual Defendants")
28 hereby enter into the following stipulation to extend the Additional Individual

Defendants' deadline to respond to the First Amended Complaint. The stipulation is based on the following:

1. Plaintiffs served their First Amended Complaint on the Additional Individual Defendants on December 22, 2023.

2. The Additional Individual Defendants' deadline to respond to the Complaint is February 20, 2024.

3. The parties hereby stipulate that the Additional Individual Defendants shall have an additional thirty (30) days from February 20, 2024 through and including March 21, 2024, to respond to the First Amended Complaint.

Dated: February 16, 2024 Respectfully submitted,

INSTITUTE FOR JUSTICE
Joseph Gay*
Robert Frommer*
Robert E. Johnson*

THE VORA LAW FIRM, P.C.
Lou Egerton-Wiley
Nilay U. Vora
Jeffrey Atteberry

/s/ Joseph Gay

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Dated: February 16, 2024

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Attorneys for Kathryn Bailey Dress, Brent James,
Walter Dix, Ryan Heaton, and Lesley Buchan

ATTESTATION UNDER LOCAL RULE 5-4.3.4

I, Jasmin Yang, am the ECF User whose ID and password are being used to file this **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)**. In compliance with Local Rule 5-4.3.4(a)(2), I hereby certify and attest that Plaintiffs' counsel, Joseph Gay, has concurred in this filing.

DATED: February 16, 2024

/s/ Jasmin Yang

JASMIN YANG

Assistant United States Attorney